

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
Peter St. Laurent	)	
Plaintiff	)	
	)	
v.	)	Civil Action No. 04-11951-NG
	)	
	)	
UNITED PARCEL SERVICE, INC.	)	
Defendant	)	
_____	)	

**STATEMENT OF UNITED PARCEL SERVICE INC. IN  
PREPARATION FOR STATUS CONFERENCE**

Pursuant to the Scheduling Order issued on November 4, 2004 in the above referenced case, United Parcel Service Inc. ("UPS") submits the following statement in preparation for the February 17, 2005 status conference:

**1. Status of the Case**

Discovery is almost complete. Peter St. Laurent has served interrogatories and document requests. UPS has answered the interrogatories, has responded to the document requests, and has produced its documents. On or about December 2, 2004, UPS served its Initial Disclosure. Peter St. Laurent has not yet served his Initial Disclosure. UPS has noticed the deposition of Mr. St. Laurent for February 28, 2005. Counsel for Mr. St. Laurent has indicated that he may not be available that day. Because discovery ends on March 1, 2005, UPS may seek an extension of the discovery period in order to complete Mr. St. Laurent's deposition. In addition, UPS would like the opportunity to review and act upon the contents of Mr. St. Laurent's Initial Disclosure prior to the discovery deadline.

**2. Scheduling for the Remainder of the Case Through Trial**

As stated above, UPS may request a one month extension of the discovery period in order to complete the deposition of Mr. St. Laurent. Otherwise, UPS proposes the following schedule:

1. Plaintiff's Initial Disclosure Served by March 1, 2005;
2. Fact Discovery extended to April 1, 2005;
3. All Dispositive Motions filed by June 1, 2005;
4. All expert witnesses on behalf of the plaintiff shall be designated in accordance with the Federal Rules of Civil Procedure and the Local Rules by August 1, 2005;
5. All experts who may be witnesses on behalf of UPS shall be designated by September 15, 2005;
6. All expert depositions shall be completed by October 31, 2005;
7. Pretrial Conference on December 1, 2005.

**3. Alternative Dispute Resolution**

UPS requests additional time to consider this option. UPS will report on its position at the Status Conference.

**4. Consent to trial before the Magistrate Judge**

UPS will consent to trial before Magistrate Judge Dein.

UNITED PARCEL SERVICE, INC.

By its attorneys,



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2/14/05 

Date: February 14, 2004.